

**INITIAL STATEMENT OF REASONS  
FOR  
PROPOSED BUILDING STANDARDS  
  
OF THE  
DIVISION OF THE STATE ARCHITECT  
  
REGARDING THE  
CALIFORNIA ADMINISTRATIVE CODE,  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1, CHAPTER 4**

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

**STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS:**

The Division of the State Architect - Structural Safety (DSA-SS) proposes to make amendments to Chapter 4 of the California Administrative Code (Part 1, Title 24) for codification as the 2013 edition California Administrative Code.

These proposed amendments to existing administrative regulations pertain to building construction for public elementary and secondary schools, and community colleges. The amendments would modify existing provisions to streamline construction-phase procedures for oversight of school building projects and facilitate project certification. In addition, DSA proposes editorial changes to clarify existing provisions and provide conformance with the proposed changes by DSA-SS to Part 2, Title 24, in this rulemaking cycle [adoption of the 2012 edition International Building Code (IBC)].

The specific purpose and rationale for necessity of these proposed changes follows:

**4-302. Scope.**

DSA proposes to add a reference to the California Building Code as a clarification.

**4-305. Application of building standards.**

The proposed change is editorial and deletes the reference to an inactive Part 7 of the CBC and adds a reference to Part 11 of the CBC.

**4-306. Approval of new school buildings, rehabilitation of school buildings and additions to school buildings.**

The proposed changes are editorial to clarify the reference to board and owner as the school board.

The proposed changes regarding the Evaluation and Design Criteria report clarify the requirements for the report preparation and provide a reference to applicable sections of Part 2 of Title 24.

The proposed change regarding definition of "relocation" is provided for clarity.

**4-307. Rehabilitation of an existing nonconforming building for use as a school building.**

The proposed changes are editorial to clarify the reference to board and owner as the school board and provide appropriate authority and reference information.

#### **4-309. Reconstruction or alteration projects in excess of \$25,000 in cost.**

Subsection (a):

The proposed changes are editorial. DSA proposes to repeal references to specific form numbers to allow procedural changes that would not conflict with substantive provisions of these regulations. DSA proposes to use an acronym for the Division of the State Architect for consistency throughout its regulations.

Subsection (c):

The proposed changes in item 1 clarify the calculation of project cost for construction projects involving voluntary lateral force resisting system modifications and provide a reference to Section 4-317(e) that restricts construction within 50 feet of the trace of an active fault.

The proposed addition of item 3 is intended to align with the provisions of Section 3408 of the 2012 IBC/2010 California Building Code (CBC), which states that when a building undergoes a change of occupancy that results in the structure being reclassified to a higher risk category, the structure shall conform to the seismic requirements for a new structure of the higher risk category. This provision was not adopted by the DSA as part of the 2010 CBC. For 2013 CBC, DSA proposes to add that a change of occupancy that results in the structure being reclassified to a higher risk category be added to the seismic rehabilitation triggers to ensure that the building code requirements for public school buildings are not less restrictive than that required for other buildings.

#### **4-310. School garages, warehouses, storage and similar buildings, dwellings for employees and miscellaneous structures.**

The proposed change is editorial and deletes the reference to an inactive Part 7 of the CBC and adds a reference to Part 11 of the CBC.

#### **4-314. Definitions.**

**APPROVED PLANS AND SPECIFICATIONS:** The proposed change is editorial to use an acronym for the Division of the State Architect for consistency throughout its regulations.

**REHABILITATION:** The proposed change is editorial to delete the reference to an inactive Part 7 of the CBC and add a reference to Part 11 of the CBC.

**SCHOOL BOARD:** The proposed change is editorial to clarify that the term also refers to a county board of education.

**SCHOOL DISTRICT:** DSA proposes to add a definition of "school district" as this term is used throughout the regulations. DSA proposed definition specifies that this term, for purposes of these regulations, also includes the community college districts and the county offices of education.

#### **4-315. Application for approval of drawings and specifications.**

Subsection (b):

DSA proposes to repeal references to specific form numbers to allow procedural changes that would not conflict with substantive provisions of these regulations. DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references.

#### **4-316. Designation of responsibilities.**

Subsection (b):

DSA proposes to repeal text at the end of the subsection as it is unnecessary and duplicates provisions found in Section 4-333(c), as proposed.

Subsections (d) and (f):

DSA proposes to repeal references to specific form numbers to allow procedural changes that would not conflict with substantive provisions of these regulations.

DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references.

#### **4-317. Plans, specifications, calculations and other data.**

Subsection (a):

The exception to the requirement of filing application fees, as described, applies to projects that seek a collaborative process review, and requires such projects to be accompanied by the application filing fee prior to submittal of preliminary construction documents to DSA. In practice, DSA frequently employs a streamlined collaborative process review by conducting one or two design-phase meetings with clients prior to submittal of plans and specifications for plan review. In these instances, the DSA does not require an application fee upfront. The proposed change, consistent with the provisions of the Education Code [sections 17319 and 81133.1], would allow DSA discretion to charge the application filing fee either at the time of application for collaborative process, or at the time of filing the application for review of plans and specifications.

Subsection (g):

DSA proposes an editorial change to the term “deferred approval” to replace it with “deferred submittal” for clarity. Deferred submittals represent items that are reviewed and approved by DSA after the approval of the plans and specifications, and this terminology is consistent with the adopted model building code.

Subsection (h):

DSA proposes an editorial change to repeal an obsolete term “original tracings.”

Authority and Reference:

The proposed change is editorial to include all applicable references to the California Education Code.

#### **4-320. Application Fees.**

DSA proposes to change the title of the section from “Fees” to “Application Fees” to clarify the applicability of this section, which refers to fees charged at the initial filing of the application for DSA review of plans and specifications.

The proposed change to reference to Section 4-321 is editorial to correct an error.

#### **4-323. Revisions of plans and specifications.**

The proposed change is editorial to clarify that plan revisions may occur any time after DSA approval. DSA proposes to repeal language that reflects outdated procedures and is not clear. This language is no longer necessary as the provisions for applications that are voided or withdrawn are contained in Sections 4-318 and 4-319, respectively. DSA proposes to add language to specify that DSA hourly rates and collection procedures shall be published.

#### **4-324. Examples and explanations of fee computation.**

The proposed changes are editorial for consistent formatting.

#### **4-325. Billing for further fees.**

The proposed change is editorial to clarify the reference to district as the school district.

#### **4-326. Fees for approval of an evaluation and design criteria report for rehabilitation of an existing nonconforming building for use as a school building.**

The proposed change is editorial to clarify the reference to owner as the school district.

#### **4-327. Fees for DSA review prior to application filing.** (as proposed)

DSA proposes to adopt regulations to charge an hourly fee for requests to review preliminary drawings and specifications, or conduct consultations with school districts during project development. Such review is conducted upon a request by a school district. These fees would allow DSA to recover costs in conducting these activities, as this scope of work is not included within the project application review and approval process.

#### **4-330. Time of beginning construction and partial construction.**

DSA proposes editorial changes to clarify the applicability of extension of approval of plans and specifications, which is permitted for a period not to extend beyond four years from the initial date of DSA approval. The purpose of this provision is to prohibit the indefinite plan approval status of projects for which construction has not commenced, as codes are periodically updated to address public safety, health and welfare.

DSA proposes to rescind the additional one year extension of approval for school construction project plans. This change was introduced in 2009 to address project approvals which would otherwise expire due to delay of construction commencement caused by the state bond fund suspension, as outlined in the Department of Finance (DOF) Budget Letter No. 08-33 dated December 18, 2008. DOF has issued a subsequent budget letter No. 10-09 dated April 27, 2010, which set up guidelines for funding bond projects subsequent the state bond issuance freeze.

The proposed change to the referenced sections of the Education Code is editorial to include all applicable references.

#### **4-331. Notice to DSA at start of construction.**

DSA proposes to repeal references to specific form numbers to allow procedural changes that would not conflict with substantive provisions of these regulations.

DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references.

#### **4-332. Notice of suspension of construction.**

The proposed change is editorial to ensure consistency with the requirement of Section 4-336(c)3, which requires filing of a verified report when construction work is suspended for more than one month. The proposed change from Section number 4-336(c)4 to Section 4-336(c)3 is editorial to correct an error.

#### **4-333. Observation and inspection of construction.**

Subsection (a)

DSA proposes changes to clarify duties of the geotechnical engineers with respect to testing and inspections, and align this section with the provisions of Chapter 18A of Part 2 of Title 24.

Subsection (b):

Item 1: DSA proposes to amend this subsection to address situations in which a district may elect to contract with a firm providing various construction-related services including project inspection. This arrangement may reduce the independence of the project inspector, which is needed for objective reporting of construction progress and issues. This proposed change would preclude a project inspector from being employed by an entity that has a contract with the school district to provide any services other than those directly related to inspection of construction.

Item 2: The proposed change is editorial to provide clarity and consistent use of the term “project inspector.”

Item 3: The proposed change is editorial to align section references with DSA proposed changes.

Item 4: The proposed change is editorial to provide clarity and consistent use of the term “project inspector.”

Item 5: DSA proposes to relocate the reference to the minimum age requirement for project inspectors to Section 4-333.1, as proposed, and make corresponding section reference changes in Item A. The change in Item C is editorial to clarify that project inspector’s responsibilities are contained within this set of regulations.

Item 6: DSA proposes to amend this subsection to clarify that project inspector assignment may change before project completion, and must be conducted in accordance with the project inspector replacement requirements proposed in Section 4-341(d). Existing provision does not allow a change in project inspector except for a project inspector removal for non-performance of duties. However, it is common for a project inspector assignment to change for various legitimate reasons, and such change would not impact project inspection and certification if an orderly transition of inspector’s duties is conducted. This proposed amendment would permit the change in project inspector assignment if certain requirements are satisfied.

Item 7, as proposed: DSA proposes to adopt language to specify that DSA may withdraw the approval of the project inspector for non-compliance with duties prescribed by the Field Act and Section 4-342(b) of these regulations. This language replaces and clarifies the existing provision of subsection (b)6.

Items 8 and 9, as proposed: The proposed items are relocated from subsection (d) to accommodate DSA proposed changes and coordinate related context.

Subsection (c):

DSA proposes to relocate the provisions related to project inspector certification from Section 4-333(c) to a new Section 4-333.1, as proposed, to improve usability of these regulations.

Subsection (c), as proposed:

Items 1 and 2: DSA proposes editorial changes to clarify general requirements for special inspection.

Item 3: DSA proposes to repeal subsection (d)3 as unnecessary and duplicative of Chapter 17A of Part 2, Title 24, which outlines requirements for special inspection of off-site fabrication.

Item 4: DSA proposes to relocate this provision to consolidate related context.

Item 5: DSA proposes to repeal subsection (d)5 and replace it with new provisions for special inspector approval contained in Section 4-335(f)1(B), as proposed.

Items 6 through 8 and 10 through 13: DSA proposes to relocate these provisions to consolidate related context.

Item 14: DSA proposes to repeal this subsection as unnecessary because it duplicates the change in Section 4-335(b), as proposed, which requires the school board to pay for structural tests and special inspections.

Item 15: DSA proposes to relocate this provision to consolidate related context.

Subsection (d), as proposed:

Item (2)A: DSA proposes an editorial change to provide a reference to a new section on project inspector certification.

Item (2)B: DSA proposes a clarifying editorial change.

Item (4): DSA proposes an editorial change to clarify that inspector's responsibilities are contained within this set of regulations.

#### **4-333.1. Project inspector certification.** (as proposed)

DSA proposes to relocate the text related to project inspector certification from Section 4-333(c) to a new Section 4-333.1, as proposed, to improve usability of these regulations.

DSA proposes to adopt new project inspector eligibility criteria to strengthen construction oversight of public school projects and improve project certification. Existing eligibility requirements for project inspector certification are less stringent than those in similar programs such as that of the Office of Statewide Health Planning and Development (OSHPD). Furthermore, the regulations lack definition of inspector qualifications, creating uncertainties with DSA process for admittance of inspectors to certification exams.

The proposal was reviewed and endorsed by the Inspection and Testing Committee of the DSA Advisory Board, which includes representatives from the American Construction Inspectors Association and the California Coalition of Professional Construction Inspectors.

The DSA proposed changes are summarized, as follows:

- DSA proposes to outline minimum requirements for admittance to inspector exam by exam class (Project Class 1 through 4). This would provide clarity to the examination requirements.
- DSA is proposing to expand qualification criteria to include building code enforcement inspection experience, professional licenses, school project construction experience, relevant education, and state and nationally-recognized inspection certifications.
- DSA proposal emphasizes experience in code-enforcement inspection and school construction for Class 1 and 2 certifications. Experience in trades and general construction is outlined for admittance to Class 3 and 4 exams.
- DSA proposes to include experience in lower certification class as one of the qualifying criteria for admittance to the exam in a greater class. This process would encourage certification as Class 3 and Class 4 inspector as an entry level certification for school inspectors.

#### **4-335. Structural tests and special inspections.**

DSA proposes to rename the section to conform with the terminology of the 2012 IBC. DSA proposes to add new and relocate existing provisions regarding special inspection to this section to consolidate related context.

Subsection (a):

DSA proposes editorial changes to clarify references to testing and inspection methods as specified in the CBC and applicable referenced standards.

DSA proposes to adopt the term “laboratory of record (LOR)” to identify the responsible laboratory to be selected by the school district to conduct the required structural tests and special inspections. The LOR represents the single facility that would conduct structural tests and special inspections, as is typical for projects under DSA jurisdiction. The LOR may subcontract for services to another DSA accepted facility for those services that the LOR is not qualified and/or not approved to perform, as specified in Section 4-335.1(b)4, as proposed.

DSA proposes editorial changes for consistent use of the term “responsible architect or structural engineer” within this subsection.

DSA proposes to make editorial changes, in fifth paragraph, to clarify the responsibilities of the responsible design professional for preparation and distribution of the statement of structural tests and special inspections.

Subsection (b):

DSA proposes to relocate provisions related to DSA acceptance of testing facilities to a new Section 4-335.1, as proposed, to consolidate related context and improve the usability of these regulations.

Subsection (b), as proposed:

DSA proposes to relocate provisions regarding payment for testing and special inspection services from subsection (f) to subsection (b) to consolidate related context. DSA proposes editorial changes to these provisions to clarify existing requirements.

Subsections (c) and (d):

DSA proposes to relocate provisions related to DSA acceptance of testing facilities to a new Section 4-335.1, as proposed, to consolidate related context and improve the usability of these regulations.

Subsection (c), as proposed:

DSA proposes editorial changes to update references to the proposed term “LOR” and clarify various provisions.

Subsection (f):

DSA proposes to relocate provisions regarding payments for testing and special inspection services to subsection (b), as proposed, to consolidate related context.

Subsection (d), as proposed:

DSA proposes to repeal existing text and adopt revised language to improve clarity and organization of these provisions, and incorporate reference to the proposed term “LOR.”

Subsection (e), as proposed:

DSA proposes editorial changes to clarify requirements for the preparation of the verified report by the LOR. In conformance with the DSA proposed changes in subsection (f)1(A), as proposed, the verified report by the LOR would include reporting on the special inspections performed by special inspectors employed by the LOR.

Subsection (f), as proposed:

DSA proposes to relocate various provisions of Section 4-333(d) to this subsection to consolidate related context. DSA proposes editorial changes to clarify provisions related to special inspection examinations administered by DSA.

Item (1), as proposed:

DSA proposes to adopt provisions for the laboratory engineering manager to have a direct supervision role with respect to special inspection services. In summary, the laboratory engineer manger would:

- Be responsible for selecting qualified special inspectors, and attesting to their qualifications through the DSA notification process;
- Supervise daily special inspection activities through to completion of each inspection discipline;
- At the completion of the testing and special inspection program, be responsible for a complete review of test and special inspection reports for conformance with the DSA approved documents;
- Verify that all work requiring special inspection was inspected; and,
- Be responsible for signing and submitting a compiled verified report covering all required structural tests and special inspections.

This proposal codifies supervisory requirements and employment practices that are currently utilized by laboratories that actively participate in the DSA Laboratory Evaluation and Approval (LEA) program. The responsible engineering managers, as representatives of five such laboratories, formed a workgroup to deliberate on the DSA proposal and provide recommendations to the Inspection and Testing Committee of the DSA Advisory Board. The Committee reviewed the proposal in four public meetings during late 2011 and early 2012 and endorsed the final draft of the proposed amendments. These amendments streamline the administration of special inspections, and provide direct supervision and consolidated verified reporting by the LOR engineering manager. These practices are necessary for school construction projects to be completed successfully with DSA certification.

Item 1(A), as proposed, contains provisions specific to special inspectors employment by the LEA laboratory and the supervision responsibilities of the laboratory's engineering manager.

Item 1(B), as proposed, contains provisions specific to special inspector employment by the school board, required DSA approval and the supervision responsibilities of the design professional in responsible charge.

Item 2, as proposed: DSA proposes editorial changes to clarify existing provisions regarding withdrawal of special inspector's approval by DSA.

Item 3, as proposed: DSA proposes to adopt language prescribing duties of special inspectors for projects under DSA jurisdiction.

Item 4, as proposed: DSA proposes to consolidate context related to existing reporting requirements and adopt requirements for completion of verified reports for special inspectors that contract individually with the school district. In accordance with the DSA proposal, special inspectors employed by the LOR would not be required to submit individual verified reports to the DSA. The cumulative LOR verified report, as indicated in subsection (e), as proposed, would replace the submission of individual verified reports by special inspectors employed by the LOR.

#### **4-335.1. DSA Laboratory Evaluation and Acceptance Program.**

Section 4-335.1 contains relocated provisions of Section 4-335(b) related to DSA acceptance of testing facilities to consolidate related context and improve the usability of these regulations.

Subsection (a):

DSA proposes editorial revisions to existing provisions to clarify requirements for the DSA Laboratory Evaluation and Acceptance program. The DSA proposes to repeal references to a specific form number to allow procedural changes that would not conflict with substantive provisions of these regulations.

Subsection (b):



Item 1, as proposed: DSA proposes to update the industry standard applicable to the laboratory accreditation. In addition, DSA proposes to adopt language that permits other equivalent accreditation standards.

Items 2 through 10, as proposed: DSA proposes to repeal existing language and adopt more specific provisions, which are based on operating standards of LEA approved laboratories that conduct testing and inspection of projects under DSA jurisdiction and achieve successful project certification. These requirements were validated by the DSA workgroup of laboratory engineering managers and endorsed by the Inspection and Testing Committee of the DSA Advisory Board.

Subsection (c):

DSA proposes clarifying editorial changes regarding the duration of LEA laboratory acceptance by the DSA.

#### **4-336. Verified Reports.**

Subsection (a):

DSA proposes editorial changes to conform to amendments proposed in Section 4-335 regarding verified reporting by LORs and special inspectors not employed by the LOR.

Subsection (b):

The DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references.

Subsection (c):

Item 1: The proposed change is editorial to clarify reference to board and owner as the school board.

Item 2: DSA proposes to remove the requirement for all special inspectors to submit verified reports and replace it with the proposed changes to LOR verified reports contained in Section 4-335(e).

Item 3: DSA proposes editorial changes to conform to amendments proposed in Section 4-335 regarding verified reporting by LORs and special inspectors not employed by the LOR.

Item 5: DSA proposes editorial changes to conform to amendments proposed in Section 4-335 regarding verified reporting by LORs and special inspectors not employed by the LOR.

Item 6: The proposed change is editorial to clarify reference to the responsible geotechnical engineer and specify the timeline for filing of a verified report.

Item 7: DSA proposes editorial changes to incorporate the term "LOR," as proposed, and specify that the LOR verified report shall be filed at the completion of the testing program.

Item 8: DSA proposes to adopt language for verified report requirements for special inspectors that contract individually and directly with the school board.

#### **4-337. Semimonthly reports.**

DSA proposes editorial clarifying changes. DSA proposes to repeal language regarding seven days allowed for filing a semimonthly report. DSA is currently developing procedural changes that would allow electronic submission of semimonthly reports. This process would enable filing the report immediately upon completion making the seven-day requirement unnecessary.

#### **4-339. Final certification of construction.**

The proposed change is editorial to clarify the reference to owner as the school board.

#### **4-341. Duties of the architect, structural engineer or professional engineer.**

Subsection (a):

DSA proposes to repeal a reference to specific form number to allow procedural changes that would not conflict with substantive provisions of these regulations.

Subsection (c):

DSA proposes an editorial change to the term “deferred approval” to replace it with “deferred submittal” for clarity and consistency with proposed changes in Section 4-317(g). Deferred submittals represent items that are reviewed and approved by DSA after the review and approval of the plans and specifications.

Subsection (d):

DSA proposes to adopt language that would contain an explicit general requirement of DSA approval of project inspectors prior to commencement of construction (or continuation of construction, as in the case of a replacement inspector).

Items 1 and 2: DSA proposes to repeal the 10-day requirement for submitting project inspector information for DSA approval. Instead, the regulations would contain a requirement for the school district or design professional to comply with the DSA approval process for project inspectors. This would allow DSA to develop procedures for inspector approval that reflect the type and complexity of the project. Existing 10-day requirement does not facilitate timely project inspector approval, especially for complex projects requiring specific skills and experiences that warrant a longer DSA review and approval period.

Item 3: DSA proposes editorial changes to provide clarity and update regulation references to correspond to other proposed changes.

Item 4: DSA proposes to adopt a requirement for the school district or design professional in general responsible charge to provide applicable information about the replacement project inspector and to obtain DSA approval for a replacement inspector.

The DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references. DSA proposes editorial changes for consistent use of the term “responsible architect or engineer” within this subsection. The DSA also proposes clarifications to the process of withdrawal of project inspector approval by the DSA.

Subsection (e):

Proposed change is editorial.

Subsection (g):

Proposed changes are editorial to rename the subsection to conform with the terminology of the 2012 IBC and update regulation references to correspond to other proposed changes.

#### **4-342. Duties of the project inspector.**

Subsection (a):

Proposed change is editorial.

Subsection (b):

Item 1: Proposed change is editorial to update regulation references to correspond to other proposed changes.

Item 2: DSA proposes to amend this item to clarify that the project inspector is required to report inconsistencies or seeming errors in the approved construction documents noted during construction.

Item 3: DSA proposes to re-organize the content of this item for clarity by repealing existing text and reintroducing it in a streamlined format. DSA proposes to incorporate related context from other items within subsection (b) that represents requirements related to the project inspector job file. DSA proposes new language at the end of the item to specify that the job file, with the exception of building codes and reference standards, shall be made a part of permanent school district records. This practice will promote document retention by school districts and facilitate future approvals of project plans and project certification. In item E, DSA proposes an editorial change to the term “deferred approval” to replace it with “deferred submittal” for clarity and consistency with proposed changes in Section 4-317(g).

Item 5: The proposed change is editorial to ensure consistency with the requirement of Section 4-336(c)3, which requires filing of a verified report when construction work is suspended for more than one month.

Item 6: DSA proposes to relocate requirements for specific construction records to item 3, as they represent project inspector job file items.

Item 7: DSA proposes to repeal reference to construction project log as unnecessary and relocate requirement for recordkeeping to item 3, as they represent project inspector job file items.

Items 6, 7 and 8, as proposed: DSA proposes to re-number the items to incorporate relocated text, as described above.

Subsection (c):

DSA proposes to repeal item 3 as unnecessary.

Subsection (d):

The proposed change in item 1 is editorial.

Subsection (g):

DSA proposes editorial changes in items 1 and 4 to clarify that the term “approval” refers to the approval of a project inspector, and not the project itself.

#### **4-343. Duties of the contractor.**

The proposed change in subsection (b) is editorial to make a spelling correction.

#### **4-345. Request for examination.**

Subsection (a):

The proposed changes are editorial. DSA proposes to add a reference to the district as the school district. DSA proposes to repeal the reference to the specific form number to allow procedural changes that would not conflict with substantive provisions of these regulations. The DSA proposes to delete the specific Internet address as it is subject to change, which could lead to conflict with the published regulatory references.

Subsection (b):

The proposed change is editorial to make a grammatical correction.

#### **4-350. Records.**

The proposed change is editorial to update reference from ORS to DSA.

#### **4-352. Submission of documents.**

The proposed changes are editorial to make a spelling correction and change section references.

#### **4-355. Advisory board.**

The proposed change is editorial to make a grammatical correction.

#### **TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS:**

No technical reports or studies were used in the development of these proposed amendments.

#### **STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS:**

The proposed amendments do not contain any mandates for specific technologies or equipment or prescriptive standards.

#### **CONSIDERATION OF REASONABLE ALTERNATIVES**

The Division of the State Architect could not identify nor determine any reasonable alternatives to the proposed administrative regulations.

#### **REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS.**

The Division of the State Architect did not identify any reasonable alternatives to the proposed administrative regulations.

#### **FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT ON BUSINESS.**

None required, as no adverse effect on business was determined on the basis that the proposed amendments are editorial.

#### **DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS**

These proposed administrative regulations do not duplicate or conflict with federal regulations.